

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Numbering Resource Optimization)	CC Docket No. 99-200
)	

REPLY COMMENTS

The National Exchange Carrier Association, Inc. (NECA) submits this reply in response to comments submitted in response to the Commission's October 17, 2001 *Public Notice* in the above captioned proceeding,¹ seeking comment on the national thousands-block number pooling rollout schedule.

NECA supports commenters that urge the Commission to establish a national cost recovery mechanism. The United States Telecom Association (USTA) maintains that it is imperative that an appropriate cost recovery mechanism be in place by the time that the thousands-block number pooling rollout is scheduled to commence in March 2002.² In addition USTA points out any such mechanism should allow recovery of costs by both pooling and non-pooling carriers, since non-pooling carriers will incur costs once thousands-block number pooling is implemented in LNP-capable area, just as they do for LNP.³

¹ *Public Notice*, DA 01-2419, released October 17, 2001 (*Notice*)

² *See* USTA at 5.

³ *Id.*

Cincinnati Bell Telephone Company (CBT) and BellSouth also cite concern that the Commission has not yet established a national cost recovery mechanism and urge the Commission to act without delay.⁴ However, BellSouth's suggestion that the Commission either extend the duration of the existing number portability tariff or increase the current number portability surcharge⁵ only addresses cost recovery for ILECs that have implemented number pooling. BellSouth's suggestion fails to address cost recovery for non-number pooling capable companies incurred as a result of supporting number pooling in adjacent areas. As USTA points out, these costs are legitimate and a sufficient cost recovery mechanism should be implemented for these carriers as well.⁶

NECA continues to urge the Commission to follow through on its original recommendation in its *Numbering Resource Optimization NPRM*⁷ to allow carrier-specific costs directly related to number pooling to be recovered through existing cost recovery mechanisms. This would allow rate-of-return (ROR) carriers to assign these costs to the interstate jurisdiction and recover them through interstate access charges.⁸

⁴ See CBT at 5, BellSouth at 13.

⁵ See BellSouth at 14.

⁶ See USTA at 6.

⁷ *Numbering Resource Optimization Notice of Proposed Rulemaking*, 14 FCC Rcd 10322 (1999)

⁸ See Comments of NECA on the *NPRM*, filed July 30, 1999 at 2; Reply Comments of NECA on the *NPRM* filed August 30, 1999 at 2; Joint Comments of NECA and the National Telephone Cooperative Association (NTCA) on the *Further Notice of Proposed Rulemaking (FNPRM)* filed May 19, 2000 at 2; Joint Reply Comments of NECA and NTCA on the *FNPRM*, filed June 9, 2000 at 3; Comments of NECA on the *Second FNPRM* filed February 14, 2001 at 4.

NECA also supports a similar cost recovery mechanism for LNP costs incurred by non-LNP capable carriers.⁹ The Commission should adopt a policy that would ensure that all carriers can recover costs related to thousands-block number pooling and LNP.

Respectfully submitted,

NATIONAL EXCHANGE
CARRIER ASSOCIATION, Inc.

Martha West
Senior Regulatory Manager

By: /s/
Richard A. Askoff
Its Attorney

November 16, 2001

80 South Jefferson Road
Whippany, NJ 07981
(973) 884-8000

⁹ On March 19, 1999, NECA filed a Joint Petition for Expedited Waiver in CC docket No. 95-116 with NTCA, USTA, the National Rural Telecom Association (NRTA), and the Organization for the Promotion and Advancement of Small telecommunications Companies (OPASTCO), seeking relief for non-LNP capable carriers to be allowed to recover their LNP costs. The petition is still pending.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Reply Comments was served this 16th day of November 2001, by electronic delivery or by mailing copies thereof by United States Mail, first class postage paid, to the persons listed below.

By: /s/ Shawn O'Brien
Shawn O'Brien

The following parties were served:

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-B204
Washington, D.C. 20554
(filed through ECFS)

Lawrence E. Sarjeant
Linda L. Kent
John W. Hunter
Keith Townsend
Julie L. Rones
USTA
1401 H St., NW
Suite 600
Washington, D.C. 20005-2164

William Brown
SBC
1401 I Street NW
Suite 1100
Washington, DC 20005

Angela Brown
BellSouth
Suite 4300
675 West Peachtree Street, NE
Atlanta, GA 30375-0724

Chrsitopher Wilson
Cincinnati Bell Telephone
201 east Fourth Street
Room 102-620
Cincinnati , OH 45202

Cynthia Miller
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Joyce Davidson
Oklahoma Corporation Commission
P.O. Box 52000
Oklahoma City, OK 73152

Gary Cohen
California PUC
505 Van Ness Ave.
San Francisco, CA 94102

Dana Joyce
Missouri PSC
P.O. Box 360
Jefferson City, MO 65102

Brian O'Connor
Voicestream Wireless
401 9th Street, NW, Suite 550
Washington, DC 20004

Michael Altschul
CTIA
1250 Connecticut Ave., NW,
Suite 800
Washington, DC 20036

Lauren McDonald, Jr.
Georgia PSC
47 Trinity Ave., SW
Atlanta, GA 30334

Max Yzaguirre
Texas PUC
1701 N. Congress Ave.
Austin, TX 78711

Jennifer Granholm
Michigan PSC
6545 Mercantile way, Suite 15
Lansing, MI 48911

Gregory Scott
Minnesota PUC
121 7th Place east
Suite 350
St. Paul, MN 55101

Pamela Arluk
Focal Communications
7799 Leesburg Pike
Suite 850 N
Falls Church, VA 22043

John Goodman
Verizon
1300 I Street , NW
Washington, DC 20005

John Scott III
Verizon Wireless
1300 I Street, NW
Suite 400-West
Washington, DC 20005

Henry Hultquist
Worldcom
1133 19th Street NW
Washington, DC 20036

Myra Karegianes
Illinois Commerce Commission
160 N. LaSalle, Suite C-800
Chicago, IL 60601

Lisa Nordstrom
Idaho PUC
PO Box 83720
Boise, ID 83720

Sylvia Lesse
Attorney for RCA
Kraskin, Lesse & Cosson LLP
2120 L Street NW
Suite 250
Washington, DC 20037

Deanne O'Dell
Pennsylvania PUC
PO Box 3265
Harrisburg, PA 17105-3265

L. Marie Guillory
R. Scott Reiter
NTCA
4121 Wilson Blvd. Tenth Floor
Arlington, VA 22203

Jeffrey W. Smith
Stephen Pastorkovich
Stuart Polikoff
OPASTCO
21 Dupont Circle, N.W., Suite 700
Washington, D.C. 20036